

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

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MUELLER BRASS CO.,

Plaintiff,

vs.

No. 2:20-cv-02496-SHL-cgc

DAVID CROMPTON,

Defendant.

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**UNOPPOSED MOTION FOR EXTENSION OF DEADLINE TO FILE  
RESPONSE TO PLAINTIFF’S MOTION FOR PROTECTIVE ORDER**

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Comes now the Defendant, by and through undersigned counsel, and respectfully moves this Honorable Court for an extension of the deadline to file a response to Plaintiff’s Motion for Protective Order, filed April 29, 2021. Plaintiff does not oppose the relief requested. Defendant submits herewith a Memorandum in Support.

Dated: May 12, 2021

Respectfully submitted,

/s/ Sarah Stuart

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*Attorneys for Defendant David Crompton*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing will be electronically filed via the Court's ECF system this 12th day of May 2021.

/s/ Sarah Elizabeth Stuart

**CERTIFICATE OF CONSULTATION**

Pursuant to Local Rule 7.2(a)(1)(B), the undersigned hereby certifies that counsel for Defendant, David Crompton (Michael Sullivan), conferred with Aubrey B. Greer, counsel for Plaintiff, Mueller Brass Co., on May 12, 2021 via phone, regarding the Motion for Extension of Deadline to File Responsive Pleading. Counsel for Crompton (Sarah Stuart) then conferred with Mr. Greer on May 12, 2021 by email. Mr. Greer indicated that "while Mueller Brass Co. has no formal opposition to the request for an extension of up to seven (7) days after Defendant's Answer and Counterclaims are filed, Mueller Brass Co. does not agree such filing will change the scope of discovery or the propriety of the Defendants' written discovery requests and Mueller Brass Co.'s lack of opposition here is not intended to be a waiver or retraction of any argument raised in its Motion for Protective Order."

/s/ Sarah Elizabeth Stuart